

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: William Daniel Vaughn, Debtor

**Case No. 24-01785-JAW
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Amended Motion to Dismiss (dk # 60) as follows:

1. Debtor commenced this case on 08/05/2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor was unemployed and is now working.
3. Debtor has filed a Motion to Allow Payment Arrearages (Dk#61) on or about April 22, 2025.
4. Debtor can continue making plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on May 7, 2025, to:

By Electronic CM/ECF Notice:

Torri Parker Martin

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.